

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**PEDRO ROSSELLÓ ET AL.,**  
*PLAINTIFFS*

VS.

**BROWN & WILLIAMSON ET AL.,**  
*DEFENDANTS*

---

Civil Case Number:  
**97-1910 (JAF)**

**MOTION FOR LEAVE TO FILE DOCUMENT**

**TO THE HONORABLE COURT:**

**COME NOW** THE NATIONAL ASSOCIATION OF ATTORNEYS GENERAL AND ITS PRESIDENT, THE HON. STEPHEN A. CARTER, by special appearance through the undersigned counsel, and without submitting to the jurisdiction of this Court, hereby respectfully state, together with the attached memorandum, and pray:

The National Association of Attorneys General and Hon. Stephen Carter timely move this Honorable Court to grant them leave to file a Reply Memorandum in support of their Motion to Strike, which is confined to the issues raised by Bekenton's Response in Opposition filed on August 22, 2005.

**WHEREFORE**, the specially appearing parties move this Honorable Court to **GRANT LEAVE** to file the attached Reply Memorandum and **DIRECT THE CLERK** to enter the same in the docket.

**RESPECTFULLY SUBMITTED** this August 29, 2005 in San Juan, Puerto Rico.

**Law Offices Pedro E. Ortiz Álvarez**  
P.O. Box 9009, Ponce PR 00732-9009  
Tel 787-841-7575 / Fax 787-841-0000  
*Special Appearance as Counsel for the National  
Association of Attorneys General and its President,  
the Hon. Stephen Carter*

S/ Gina Ismalia Gutiérrez-Gálang  
**Gina Ismalia Gutiérrez-Gálang**, #218513  
Email: ismalia@poapr.com

**I HEREBY CERTIFY** that on August 29, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Benjamin Acosta, Jr, Salvador Antonetti-Zequeira, Francisco A. Besosa, Heriberto J. Burgos-Perez, Edgardo Cartagena-Santiago, Jose A. Fuentes-Agostini, William A. Graffam, Manuel A. Guzman-Rodriguez, Paul H. Hulsey, Juan A. Ramos-Diaz, Hector Reichard-Jr., Vicente Santori-Coll, Francisco M. Troncoso, Richard Schell-Asad and Eric A. Tulla.**

S/ Gina Ismalia Gutiérrez-Gálang